

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
SOUTHERN DIVISION**

IN RE:)	Case #:
)	
VENUE CHURCH INC.)	CHAPTER 11
)	
Debtors.)	

APPLICATION FOR ORDER APPROVING EMPLOYMENT OF ATTORNEY

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NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Notice is hereby given that:

Pursuant to E.D. Tenn. LBR 9013-1(h), the Court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of the Court at 31 East 11th Street, Chattanooga, TN 37402, an objection within 21 days from the date this paper was filed and serve a copy on the Movant's attorney, W. Thomas Bible, Jr., 6918 Shallowford Road, Chattanooga, TN 37421. If you file and serve an objection within the time permitted, the Court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Venue Church, Inc. (The "Debtors") hereby applies to this Court pursuant to 11 U.S.C. § 327 and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for an Order authorizing and approving the employment of the Law Office of W. Thomas Bible, Jr. (The "Firm") to represent them as counsel in this case. A verified statement of the Firm pursuant to 11 U.S.C. § 329 and Rules 2014(a) and 2016(b) of the Bankruptcy Rules is attached hereto as Exhibit "A". In support of this Application, the Debtors represent as follows:

1. On August 16, 2022, Debtor, through his attorneys, filed petition under Chapter 11 of the Bankruptcy Code.

2. The applicant, as debtor-in-possession, is currently not represented in this case and wishes to employ W. Thomas Bible, Jr., and the Law Office of W. Thomas Bible, Jr. as the attorneys for the debtor-in-possession in this Chapter 11 case.

3. The Debtors are in possession of their property and is managing their affairs as Debtors -in-Possession. No trustee has been appointed, nor has a committee of unsecured creditors been appointed.

4. The Debtors have selected the Firm because the Debtors believe they are well qualified to represent them in this proceeding.

5. The applicant proposes to employ the above-named attorneys and law firm for the following purposes;

- a. to advise the applicants as to their rights, duties and powers as debtors-in-possession;
- b. to investigate and if necessary, institute legal action on behalf of the Debtors to collect and recover assets of the estate of the Debtors;
- c. to prepare and file the statements, schedules, plans, and other documents and pleadings necessary to be filed by the applicants in this case;
- d. to assist and counsel the Debtors in the preparation, presentation and confirmation of their disclosure statement and plan of reorganization;
- e. to represent the applicant at all hearings, meetings of creditors, conferences, trials, and other proceedings in this case; and
- f. to perform such other legal services as may be necessary in connection with this case.

6. The applicant has made careful and diligent inquiries and they are satisfied that the above-named attorneys and law firm are qualified and competent to represent the applicant as the debtor-in-possession in this case for the following reasons:

- a. the attorneys, on behalf of the applicant, has prepared and filed the petition and related documents initiating this Chapter 11 case; and
- b. the attorney W. Thomas Bible, Jr. and Harry Miller are admitted to practice before this court and are experienced in bankruptcy practice and Chapter 11 proceedings.

7. The applicant has entered into a written employment agreement with the above-named attorneys and law firm dated August 16, 2022, with respect to the services to be performed by the said attorneys and the compensation to be paid to the attorneys for such services. A copy of the agreement is attached to this application and the applicants proposes to compensate the attorney at the rate set forth in the agreement, subject to the approval of the court after the rendering of such services.

8. The applicant is informed and believes that the above-named attorneys and Firm have no connection with the Debtors, their creditors, or any other party-of-interest, or their respective attorneys or accountants. The applicant is informed and believes that the above-named attorneys and law firm do not hold or represent an interest adverse to the estate with respect to the matters on which they are employed, and that the employment of the above-named attorneys and Firm is in the best interests of the estate.

WHEREFORE, the applicants respectfully request this Honorable Court to enter an order approving the employment of W. Thomas Bible, Jr., and the Firm as attorneys for the debtor-in-possession in this case.

Respectfully submitted:

/s/ Tavner Smith,
Tavner Smith, President/Debtor

TOM BIBLE LAW

BY: /s/ W. Thomas Bible, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I have sent a true and exact copy of the foregoing Application for Order Approving Employment of Attorney to Assistant U.S. Trustee, Office of the United States Trustee, 31 E. 11th Street 4th Floor, Chattanooga, Tennessee 37402; and to the Debtor and all other creditors and parties of interest as evidenced by the attached mailing matrix; by United States Mail, postage pre-paid, this the 24th day of August, 2022

/s/ W. Thomas Bible, Jr.
W. Thomas Bible, Jr.